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PLEASE REPLY TO
NEW JERSEY OFFICE

July 10, 2015

VIA ECF

Honorable Jack B. Weinstein
U.S. District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re Lighting & Supplies, Inc. v. Sunlite USA, Inc. and
 Halston Mikail
 Civil Action No.: 14-cv-4344 (JBW)(JO)

Dear Judge Weinstein:

We represent the defendants Sunlite-USA Inc., Halston Mikail and Spotlite America Corp. In the above-captioned matter. This case is scheduled for trial on August 11, 2015. We write, with the consent of adversary counsel, to request an adjournment of this trial date in this matter.

The adjournment is necessary because of the volume of uncompleted discovery. At the time of the parties' appearance before the court on June 4, 2015, no discovery had been taken. To comply with the court's expedited trial schedule, we prepared a discovery plan that required us to complete all document discovery today and to have the case ready for pre-trial at the end of the month.

In hindsight, the discovery schedule is severely overly optimistic. I have received from the plaintiff some 75 interrogatories (25 for each of the three parties I represent) together with approximately 180 requests for the production of documents. I have also received a list of nine persons that the plaintiff wants to depose, and eight of those depositions must be conducted out of state. I also would like to take two to four depositions of my own.

In addition, given the size of my own operation -- I am a sole practitioner with two of-counsel attorneys who work part-time schedules -- I cannot zealously represent the clients in this case and keep pace with the other matters in the office.

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Accordingly, I respectfully request that the trial date be adjourned at least 60 days and that the parties be given an opportunity to reset the discovery deadlines. As noted, the plaintiff has no objection to this request. In addition, as the Court is aware, all of the injunctive relief aspects of the case were resolved by an agreement between the parties.

We appreciate the Court's consideration. Please advise if any additional information is required.

Respectfully,

A handwritten signature in black ink, appearing to read "Jay R McDaniel", written in a cursive style.

Jay R McDaniel